

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)0d Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kimberly Wilson, Esq. 031441997	CASE NO.: 24-20282-VFP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Conrad Manisera, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

BP-JR 1 Loan Trust ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE #13), and states as follows:

1. Debtor, Conrad Manisera ("Debtor") filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 16, 2024
2. Secured Creditor holds a security interest in the Debtor's real property located at 113 Morris Avenue Denville, NJ 07834, by virtue of a Mortgage recorded on June 15, 2004 in book 17213 at page 273 of the Public Records of Morris County, NJ. Said Mortgage secures a Note in the amount of \$100,100.00.
3. The Debtor filed a Chapter 13 Plan on November 7, 2024.
4. The arrears proposed in the Plan are insufficient to satisfy the pre-petition arrears. The Secured Creditor estimates arrears will be \$21,763.07.
5. Secured Creditor objects to any plan that does not satisfy and pay the full pre-petition arrears subject to the filing of the claim and the regular monthly payment direct to lender.
6. As such, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan in the event the full proof of claim arrears are not being paid, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC

Authorized Agent for Secured Creditor

130 Clinton Road, Suite 202, Lobby B

Fairfield, NJ 07004

Telephone: 973-575-0707

Fax: 973-404-8886

By: /s/ Kimberly Wilson

Kimberly Wilson, Esquire

NJ Bar Number # 031441997

Email: kimwilson@raslg.com

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)0d Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kimberly Wilson, Esq. 031441997	CASE NO.: 24-20282-VFP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Conrad Manisera, Debtor.	

CERTIFICATION OF SERVICE

1. I, Devin Atchison, am the secretary/paralegal for Robertson, Anschutz, Schneid, Crane & Partners, PLLC, who represents BP-JR 1 Loan Trust in the above-captioned matter.
2. On November 19, 2024, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below:

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN;
Certificate of Service.**

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date : 11/19/2024

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Authorized Agent for Secured Creditor
130 Clinton Road, Suite 202, Lobby B
Fairfield, NJ 07004
Telephone: 973-575-0707
By: /s/ Devin Atchison
Email: datchison@raslg.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Andrew G. Greenberg Law Offices of Andrew G. Greenberg 4400 Route 9 South, Suite 1000 Freehold, NJ 07728	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Conrad Manisera 113 Morris Avenue Denville, NJ 07834	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004-1550	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)